



To the Honorable H. A. W. Allen,
Judge of the Circuit Court of Lee
County, Virginia:

Humbly complaining, your
orator L. W. Long will respect-
fully shew to your honor that
several years ago he intermar-
ried with one Louisa Davis.

At the time of said marriage
your orator was a citizen of Lee
County Virginia, where he and his
said wife continued to reside togeth-
er as husband and wife until some-
thing like four years ago, when
his said wife the said Louisa
Long, for some reason unknown
to him, became quarrelsome, dis-
satisfied, and abusive; acting in
every way to ^{annoy} her said husband,
your orator, unhappy and miser-
able, and finally abandoned your
orator, left the state of Virginia
and now lives in the state of Ken-
tucky.

Your orator will now shew
to your honor that he was to his
said wife a faithful, industrious,

and true husband during all the time they lived together, and that he never ceased to provide for her a good living, and that he would have continued to be such had she remained with him and permitted him.

Your orator will now shew to your honor that he has been a citizen of Lee County Virginia for more than twentyfive years, that he is still a resident of said County of Lee; that his said wife abandoned and left him more than three years ago and is fully determined as he believes never to live with him again.

Now the object of this suit is to procure a dissolution of the bonds of matrimony now existing between him and the said Louisa Long, and to this end he makes the said Louisa Long a party defendant to this bill and prays that she be required to answer the same, but she need not do so under oath, that being waived, and upon a final hearing he prays that the bonds of matrimony now existing between him

and the said Conise Long be dis-
solved. And he praye for full
and general relief.

May subpoena issue &c.

G. W. Long,

H. L. Woodward

By counsel.

Atty for Plff.

G. W. Long
vs { Bill in Chy.
Louisa Long.

1900, 1st May Rules Bill
filed & pa accepted

" 2nd May Rules Cause
set for hearing

1890 to 1900

L.

L. W. Long Plff.
vs } In Chancery,
Louisa Long Deft.

This cause came on this day to be heard upon the bill of the plaintiff and the depositions of witnesses and was argued by counsel, and it appearing to the court that process had been duly served on the defendant Louisa Long by her acceptance thereof and it further appearing to the court that from the depositions of witnesses the defendant Louisa Long deserted and abandoned her husband L. W. Long more than three years before the institution of this suit with the intention of never living with him again, and without any cause therefor; on consideration of all which, it is adjudged, ordered, and decreed, that the bonds of matrimony heretofore existing between the said L. W. Long, and Louisa Long be, and are hereby dissolved. It is further ordered, adjudged, and decreed that the said L. W. Long may retain the custody of the three children which were born to him and the said Lou-

Si. W. Long, Ref.
us } Decree
Louisa Long Deft.

En. on - C. O. B.
No 6. p 399

Enter this decree
H A W St
this June 7th 1900,

See Long and said defendant is en-
joined and inhibited from interfering
with said assets.
There being nothing more to be
done this decree is withdrawn from
the docket.

The depositions of A. M. Brown and others taken at the late office of H. L. Woodward on the 1st day of June 1900, to be read as evidence on behalf of the plaintiff in the chancery cause of L. W. Long against Louisa Long now pending ~~now pending~~ in the Circuit Court of Lee County Virginia.

Present H. L. Woodward counsel for plaintiff.

M. B. Spencer, a witness of lawful age deposes and says:

Ques. 1 Please state your age, residence, and occupation?

Ans. My name is M. B. Spencer I am forty four years old - Jonesville Va and am a Physician.

Ques. 2 Are you acquainted with the plaintiff L. W. Long and the defendant Louisa Long who are parties to this suit, and if you are state how long you have known ^{them?}

Ans. I know L. W. Long we have known him for 20 years or more. I knew the defendant Louisa Long also - and have known ^{her} 10 years

Ques 3

do you know whether or not they are living together at this time and if not how long has it been since their separation?

Ans

I know they are not living together now as man and wife - The defendant Louisa Long having left Jonesville as she said for "muddled-brain" I think it was something over three years ago. After she had separated from the plaintiff G. W. Long I heard her make the statement that she would never live with him any more.

And further this deponent says that not

M. B. Spencer

William W. another witness of long fulage being duly sworn deposes and says:

Ques. 1

What is your age, place of residence and occupation?

Ans.

My age is 29 years, I reside near Jonesville Va. my occupation is labour on public works.

Ques. 2.

Are you acquainted with the plaintiff G. W. Long in this suit and his wife Louisa Long, if so how long have you known them?

Ans.

I am acquainted with each of them and have seen for about five years? I have been living within one mile of the S. W. Long for the last two years, and for about two years before that time I lived near them.

Ques. 3

Do you know how long since the plaintiff S. W. Long and Lornisa Long the defendant were married to each other, and if there are any children born to them during said marriage state how many?

Ans.

I do not know exactly how long it has been since they were married but do know that it was more than five years ago.

There are three children born to them during said marriage and they are now living with their father S. W. Long.

Ques. 4

Please state if it ^{is} not a fact that the defendant Lornisa Long ~~abandoned~~ her husband, left the state of Virginia and is now living in Kentucky.

Ans.

I know that she has.

Ques. 5

How long has it been since she abandoned him?

Ans.

It has been more than three years since she left her husband and she said when she left that she never intended to live with him again.

Ques. 6

How did the plaintiff S. W. Long

treat the defend ant Larissa Long as
to providing a living for her and
in other ways and how did she
act toward him while they were
living together?

Ans.

The plaintiff G. W. Long provid-
ed for his wife the defendant, and
was devoted and tried to ~~be~~ and
did the best he could to make her hap-
py and contented, but Larissa his
wife was very quarrelsome, abu-
sive and disagreeable to him in
every way, and continued to be such
up to the time she abandoned him.

Ques. 7

Do you know how she is liv-
ing now and whether or not
she is living with another man?

Ans.

I have seen her living in a
house in Middleborough Ky with an
other man, with no one else stay-
ing at the same house and they both
told me that they were living togeth-
er.

And further this deponent says that

Witness C. C. Lockenbush.

Wm^{his} X Roe
" mark

Ques. 1

G. W. Long a witness of lawful
age being duly sworn deposes and says.
What is your age, residence, and
occupation?

Ans

my age is 38 years. I reside near
Janesville V. my occupation is farming

Ques. 2 Are you the plaintiff in this suit
and how long has it been since
you were married to the defend-
ant?

Ans. I Am. we were married 10 years ago

Ques 3. Are you and the defendant now
living together, if not how long
have you been separated?

ans we are not. separated 3 years 10 days of
last Nov -

Ques 4. Whose fault is it that you
and she are not now living
together?

ans. It is her fault. I did all I
could for her while living with
her to make her happy & comfortable
but she would not be pleased
with any thing I done for her.
She was Quarrelsome and disagreeable
all the time. finally left Nov 10 1896
and went to Middleboro Mass.
She declared her intention never
to live with me again. and I
have not seen her since, but
am informed she is living with
an other man. I W Long

A. M. Brown another witness
of lawful age being duly
sworn deposes and says:

Ques. 1

What is your age, place of residence and occupation?

ans

I am 75 years old. live in Jonesville Va.
Hotel keeper.

Ques. 2

Do you know the plaintiff L.
W. Long and the defendant Maria
Long in this suit, if so how
long?

Ans.

I do. I have known them for seven
or eight years.

Ques. 3

Do you know whether or not she
deserted him and how ^{long} since?

ans

I know she left him and I was
informed she went to Middleburg
Ky. I am satisfied it has been
more than three years since she left
him.

Ques 4

Do you know ^{how} the Plaintiff
L. W. Long treated her.

ans

He worked for me a good deal
and I think he was kind to her
and ^{I suppose} that he gave her money he got
of me. and further this deponent
said not.

A. M. Brown

Costs.

Notary one hour

1.75cts

Virginia Lee County Torrit:

I, C. C. Blankenship Jr. a. Notary Public of Lee County Virginia, do certify that the foregoing depositions of M. B. Spencer, Wm. Mae, L. W. Cook and A. M. Brown were duly taken sworn to and subscribed before me at the time and place and for the purposes mentioned in the captioned instrument to the notice hereto attached.

Given under my hand this the 1st day of June 1900.

C. C. Blankenship N.P.

Is. M. Long
22s } depositions.
Louisa Long,

To Louisa Long

Take notice that on ~~Thursday~~ ^{Friday} June 1st at the law office of
H. L. Woodward in the town of
Jonesville Virginia between the
hours of 9 A. M. and 5 P. M. I
will proceed to take the deposi-
tions of A. M. Brown and others
to be used as evidence in my
behalf in a certain ^{in chancery} suit now de-
pending in the Circuit Court of
Lee County Virginia in which I
am plaintiff and you are de-
fendant. If for any cause, the
taking of depositions be not com-
pleted on that day the same will
be adjourned from day to day, from
time to time, or from place to place,
until completed.

May 30th 1900.

L. M. Long,
By Counsel.

Virginia, Lee Co., Tenn.

I, C. C. Blankenship Jr., a
Notary Public for Lee County Vir-
ginia do hereby certify that William
Mal personally appeared before
me in my county aforesaid and
made oath that he presented the with-
in notice by delivering a copy of the
same to Janice Long on the 31st
day May 1900.

Witness under my hand this the
1st day of June 1900.

C. C. Blankenship, N.P.

C. M. Long.
vs } Nature to take
depositions.
Janice Long.

The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon

Louisa Long

Louisa Long April 7th 1900

Widdlesboro Bell Co.

Sty.

to appear at the Clerk's office of the Circuit Court of the County of Lee, at the rules to be held
for the said court, on the *1st* Monday in *May* *1900* ~~189~~, to answer a
bill in chancery exhibited against *her* in our said court by *G. M. Long*

And have then there this writ. Witness, A. B. MUNSEY, Clerk of our said Court, at the
court-house, the *31st* day of *March* *1900* ~~189~~, and in the *124th* year of the
Commonwealth.

A. B. Munsey Clerk

G. M. Long

vs. {

SUBPOENA
IN CHANCERY

Louisa Long

H. L. Woodward p. q.

To 1st May Rules.
Circuit Court.

I hereby accept legal
service of the within
notice this April 19th 1900.
Louisa Long.